

Exhibit B

From: Brown, Jay Ward (DC)
Sent: Friday, October 14, 2022 3:24 PM
To: Tab Turner; Amy Parker
Subject: RE: Attkisson, et al. v. Bridges, et al., No. 20-cv-00068

Tab:

CBS has engaged a vendor to assess the images of two drives, which appear to contain nearly 600 GB of data, in order to determine the file-types contained on them and the relative proportions of each file type. Transferring the files to the vendor and then undertaking that analysis in an appropriate manner takes time. We will report further as soon as the vendor has completed its analysis.

But to be clear, under no circumstances will CBS simply deliver to you, unreviewed, either the “original” or any “copy” of a CBS computer drive that likely contains privileged, confidential, or other protectible material and, likely, significant amounts of non-responsive information.

Jay

From: Tab Turner <tab@tturner.com>
Sent: Thursday, October 13, 2022 4:59 PM
To: Brown, Jay Ward (DC) <brownjay@ballardspahr.com>; Amy Parker <Amy@tturner.com>
Subject: RE: Attkisson, et al. v. Bridges, et al., No. 20-cv-00068

⚠ EXTERNAL

Amy and Jay:

Can someone provide me with a status on the hard drive?

Tab Turner
TURNER & ASSOCIATES, P.A.



<https://www.linkedin.com/in/tab-turner-3a04b5a/>

From: Tab Turner
Sent: Saturday, October 1, 2022 6:33 AM
To: 'Brown, Jay Ward' <brownjay@ballardspahr.com>; Amy Parker <Amy@tturner.com>
Subject: RE: Attkisson, et al. v. Bridges, et al., No. 20-cv-00068

Jay:

Can you please ship the hard drive to Amy at my office? Please use tracking and please send a chain of custody letter verifying when CBS received the hard drive from Cyberpoint; confirming that it has been in

CBS' possession since; and confirming that it is begin produced per the subpoena; and that is either (a) an authentic copy of what CBS has or (b) is the original and the only version that CBS has and CBS is producing it. It might be safer to produce an authentic copy and retain the one CBS has, but I will leave that to you.

Amy is copied.

Tab Turner
TURNER & ASSOCIATES, P.A.



<https://www.linkedin.com/in/tab-turner-3a04b5a/>

From: Brown, Jay Ward [<mailto:brownjay@ballardspahr.com>]
Sent: Friday, September 30, 2022 2:23 PM
To: Tab Turner <tab@tturner.com>
Subject: RE: Attkisson, et al. v. Bridges, et al., No. 20-cv-00068

Tab, CBS has conducted manual searches of its storage facilities and has located what appears to be a copy of the hard drive. It is in the process of confirming the same. Jay

From: Tab Turner <tab@tturner.com>
Sent: Friday, September 30, 2022 1:52 PM
To: Brown, Jay Ward (DC) <brownjay@ballardspahr.com>
Subject: RE: Attkisson, et al. v. Bridges, et al., No. 20-cv-00068

⚠ EXTERNAL

Jay-

What about the physical evidence CyberPoint had delivered to CBS (the hard drive copy)?

Tab Turner
TURNER & ASSOCIATES, P.A.

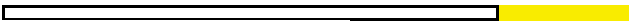


<https://www.linkedin.com/in/tab-turner-3a04b5a/>

From: Brown, Jay Ward [<mailto:brownjay@ballardspahr.com>]
Sent: Friday, September 30, 2022 8:55 AM
To: Tab Turner <tab@tturner.com>; Tara Tighe <ttighe@schertlerlaw.com>; Tiffany Craig <Tiffany@tturner.com>
Cc: Schell, Jacquelyn N. <SchellJ@ballardspahr.com>
Subject: Attkisson, et al. v. Bridges, et al., No. 20-cv-00068

Dear Counsel: Please see the attached correspondence and custodial declaration. Thank you. Jay

Jay Ward Brown
He/Him/His



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VCARD



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